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From: a.macrander@shell.com
Sent: Sat 10/26/2013 3:24:37 PM

Hahn/Erin/Andrea:

Thank you for taking the time on Monday to assist in reaching agreement on the appropriate path forward with respect to the Agency's suggestion in its' September 12 email that Shell should propose threshold levels for those metals from the list of recommended analytes that do not have existing saltwater chronic criteria. As we expressed on the call, Shell is reticent to suggest threshold values at this point in the process and we do not see the need for such values to move forward with the Environmental Monitoring Plan (EMP) for our immediate future exploration work.

In lieu of suggesting threshold values in advance of results, it is Shell's suggestion that we evaluate the data that we receive from the established baseline studies program and any additional phase I sampling that is done, along with the phase III and phase IV sampling. At that point, comparison of the levels of those metals for which criteria do not exist between baseline and post drilling sampling would provide an understanding of whether these levels may be are elevated above background in the post drilling environment.

If the levels of these metals from the post drilling sampling fall within the range of statistical variability for baseline/phase I sampling, the conclusion will be that no drilling related increase in concentration has occurred and no further evaluation will be required. If, however, a metal is shown to be elevated in post-drilling samples above this statistical variability, further analysis of the relative risk represented by these levels will be conducted. At that point, Shell's report of EMP results would include a review of existing relevant toxicological data for those metals and follow typical risk evaluation protocols to evaluate potential ecological and health risks.

Please provide any comments on this proposed path forward and/or an indication of the Agency's concurrence.

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